## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

ALLISON HETRICK, individually and on behalf of all others similarly situated,

Plaintiff,

Civil Action No. 1:25-cv-10103

v.

ASCEND LEARNING, LLC,

Defendant.

## MOTION FOR ADMISSION PRO HAC VICE OF ELLIOT O. JACKSON ON BEHALF OF PLAINTIFFS

William F. Sinnott, as a member in good standing of the Massachusetts Bar and of the Federal District Court of the District of Massachusetts, in accordance with Rule 83.5.3 of the Local Rules of the U.S. District Court for the District of Massachusetts, respectfully moves this Honorable Court for the admission of Elliot O. Jackson, Esquire, to practice law *pro hac vice* before this Court in this matter. As grounds, therefore, Attorney William F. Sinnott hereby certifies, and states as follows:

- 1. William F. Sinnott (the "Undersigned") is a member in good standing of the Massachusetts Bar and has been licensed to practice law before the Courts of the Commonwealth of Massachusetts since 1985;
- 2. The Undersigned is admitted to practice law before the Federal District Court for the District of Massachusetts;
- 3. The Undersigned intends to act as local counsel in this matter for Plaintiffs. As such, the Undersigned seeks to have Attorney Elliot O. Jackson admitted *pro hac vice* to serve as cocounsel for Plaintiffs;

- 4. Elliot O. Jackson, Esquire is a member in good standing of the bars for the State of Florida and New York and has been a member of such state bars since February 2022 and November 2023 respectively, see signed Certification of Attorney Elliot Jackson attached hereto as Exhibit 1;
- 5. Elliot O. Jackson, Esquire is a member in good standing of every jurisdiction where he has been admitted to practice law;
  - 6. Elliot O. Jackson, Esquire has no disciplinary proceedings pending against him;
- 7. Elliot O. Jackson, Esquire has not previously had a pro hac vice admission (or other limited purpose admission) to this Court revoked for misconduct;
- 8. Elliot O. Jackson, Esquire, has read and agrees to comply with the Local Rules of the U.S. District Court for the District of Massachusetts; and
  - 9. The address for Elliot O. Jackson, Esquire, is as follows:

Elliot O. Jackson Florida Bar No. 1034536 New York Attorney Reg. No. 6076798

## HEDIN LLP

1395 Brickell Avenue, Suite 610 Miami, Florida 33131 Telephone: (305) 357-2107 Facsimile: (305) 200-8801 ejackson@hedinllp.com

WHEREFORE, William F. Sinnott, Esquire, hereby moves this Honorable Court for the grant of an order allowing Elliot O. Jackson, Esquire, to appear pro hac vice in this matter.

> By: /s/ William F. Sinnott William F. Sinnott, BBO #547423 HINCKLEY, ALLEN & SNYDER LLP 28 State Street Boston, MA 02109 wsinnott@hinckleyallen.com Tel: (617) 345-9000 Fax: (617) 345-9020

ATTORNEY FOR PLAINTIFFS

**CERTIFICATE OF SERVICE** 

I, William F. Sinnott, hereby certify that this document filed through the ECF system will

be sent electronically to the registered participants as identified on the Notice of Electronic Filing

(NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: January 23, 2025 /s/ William F. Sinnott

William F. Sinnott